

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TN

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In Re:

T.R.A. DOCKET ROOM

TENNESSEE AMERICAN WATER
COMPANY TO CHANGE AND
INCREASE CERTAIN RATES AND
CHARGES SO AS TO PERMIT IT TO
EARN A FAIR AND ADEQUATE RATE
OF RETURN ON ITS PROPERTY USED
AND USEFUL IN FURNISHING WATER
SERVICE TO ITS CUSTOMERS

DOCKET NO.
04-00288

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Comes now the City of Chattanooga, by and through counsel, and propounds the following discovery requests:

- (1) Why is the company experiencing an increase in pension costs? Please produce copies of actuary reports for all years subsequent to 1999. (Diskin, pg. 12; Watson, pg. 5)
- (2) What positions and job responsibilities have been eliminated from the Chattanooga office and explain how the functions formerly performed by these employees will be performed in the new organization. Please produce a before-and-after list of TAWC employees by position.
- (3) What third party entity will determine eligibility for the twenty-five percent service charge discount?
- (4) Provide copies of engineering studies or other documentation of the need for the major capital improvements identified on pages three and four of Monty L. Bishop's direct testimony.

Respectfully Submitted,

CITY OF CHATTANOOGA, TENNESSEE
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BY: 

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 12th day of November, 2004, served the foregoing Interrogatories and Request for Production of Documents either by fax, overnight delivery service or first class mail, postage prepaid, to all parties of record at their addresses shown below:

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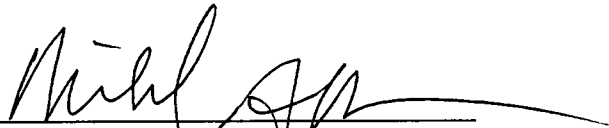
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